



GEORGIA M. PESTANA
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

COREY S. SHOOK
Senior Counsel
phone: (212) 356-5051
cshook@law.nyc.gov

September 13, 2019

BY ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kenneth V. Iacone, Sr. v. 123rd Precinct, et al.
19 Civ. 3859 (KAM) (VMS)

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, and the attorney assigned to the above-referenced case. This Office writes in response to the Court's Order dated July 30, 2019.

Plaintiff brings this action pursuant to 42 U.S.C. § 1983, alleging that on October 31, 2018, he was falsely arrested by officers assigned to the 123rd Precinct of the New York City Police Department ("NYPD") following a traffic stop of a vehicle in which Plaintiff was a passenger. (ECF No. 1.) In the caption of the Complaint, Plaintiff lists two John Doe "arresting" officers whom he believes were involved in his arrest.

The Court's Order, pursuant to Valentin v. Dinkins, 121 F.3d 72 (2d Cir. 1997), requested that this Office ascertain the full name and address for service of process for the John or Jane Doe "arresting officers" allegedly involved in the incident. The NYPD arrest paperwork we have received to date indicates that Plaintiff's arresting officer on October 31, 2019 was Police Officer Cuadros. According to 123rd Precinct roll call for October 31, 2018, Officer Cuadros was assigned to an anti-crime team along with Police Officer Zielinski and three other members of service. Upon information and belief, Officer Cuadros may have "partnered" with Officer Zielinski at the time of the incident. We have no further information at this time to know what involvement, if any, Officer Zielinski had in Plaintiff's arrest. This Office will continue its investigation.

Therefore, pursuant to the Court's Order on July 30, 2019 and Valentin v. Dinkins, 121 F.3d 72 (2d Cir. 1997), this Office provides the proper service address of the assigned arresting officer for Plaintiff's arrest on October 31, 2018, as follows:

Police Officer Cuadros
Shield No. 20548
New York City Police Department
123rd Precinct
116 Main Street
Staten Island, New York 10307

Likewise, this Office provides the proper service address of Officer Zielinski as follows:

Police Officer Zielinski
Shield No. 12893
New York City Police Department
123rd Precinct
116 Main Street
Staten Island, New York 10307

This Office thanks the Court for its attention to this matter.

Respectfully submitted,



Corey S. Shoock
Senior Counsel
Special Federal Litigation Division

cc: **BY FIRST-CLASS MAIL**
Kenneth V. Iacone, Sr.
Plaintiff Pro Se
MC #154549
Middlesex County Adult
Corrections Center
PO Box 266
New Brunswick, New Jersey 08903